

WRITTEN TESTIMONY
SUSAN SUHANOVSKY
PRESIDENT
THE TORRINGTON WATER COMPANY
BEFORE THE ENVIRONMENT COMMITTEE
MARCH 7, 2011

My name is Susan M. Suhanovsky. I am the President of The Torrington Water Company, (the "Company"). My business address is 277 Norfolk Rd., Torrington, CT

The Torrington Water Company is a privately held, investor-owned, public service water company. The Company serves approximately 40,000 people in five towns.

The Torrington Water Company (TWC) opposes HB-6505, An Act Concerning Stream Flow Regulations. The legislature's Regulations Review Committee rejected the regulations on two separate occasions because of concerns regarding the impact of the regulations on safe yield – the amount of water needed to meet the needs of the communities we serve – as well as concerns regarding economic development and water rates. Despite failing to address these concerns, to date, HB-6505 gives DEP free rein to expand the scope of the regulations to include groundwater withdrawals without setting clear parameters on how groundwater would be regulated.

HB-6505 also fails to incorporate protections for safe yield and margin of safety that would help ensure that communities would retain sufficient water supplies to support economic development and meet the public health and safety needs of its citizens. This issue was cited as a chief reason that the legislature's Regulations Review Committee rejected the regulations. Unfortunately, this issue has not yet been adequately addressed.

Provisions affecting groundwater withdrawals have been deleted from the scope of the regulations, which have helped mitigate some concerns. Regulating groundwater is very complex because of the dynamics of groundwater systems, climate, population, and technology. The significant uncertainties associated with groundwater and its hydrologic connection to stream flow presents particular challenges in crafting regulations.

Clearly, the impact of any legislation affecting groundwater withdrawals should be carefully crafted to address concerns regarding its impact on public water suppliers which serve the important mission of protecting public health and safety, and providing a service to support the economic health of our communities. Giving DEP broad latitude to regulate groundwater withdrawals may jeopardize this mission, as evidenced by their previous attempts to regulate groundwater withdrawals **For these reasons, we urge your oppose HB-6505.**